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March 17, 2021

Hon. Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Zhi Ming Zhang
18 CR 419 (BMC)

Dear Judge Cogan:

As you are aware, the law firm of Wenger & Arlia Esqs. has been retained to represent the defendant, Zhi Ming Zhang, in the above-referenced prosecution.

The purpose of this letter motion is to request a modification of my client's conditions of release. Mr. Zhang wishes to travel to Jeffersonville, Indiana by car, to purchase a TLG Peterbilt Truck for his freight truck business. He wishes to leave this Saturday March 20, 2021 with a co-driver and travel directly twelve hours approximately to Indiana. He expects to immediately drive back the aforementioned truck upon its purchase, with the intention of arriving to his home in Staten Island no later than Sunday March 21, 2021 before midnight.

USA William Campos has been informed of this application and on behalf of the Government has advised me that there is no objection to the aforementioned motion.

Thank you for your prompt attention to this matter.

Respectfully yours,

John Arlia

John Arlia (JA 6781)